

A PARTNERSHIP

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December 5, 2016

Certified Mail: 7012 2920 0001 0890 6665

Division of Third-Party Liability
Department of Public Welfare
PO Box 8486
Harrisburg, PA 17105

Re: Laura M. Maietta

Dear Sir/Madam:

Please be advised this office represents Laura Maietta in a Products Liability multi-district litigation involving IVC Filters which Ms. Maietta had implanted on October 3, 2003 and began having issues March 11, 2016 through the present.

Please bear in mind, not all medical services rendered between the above dates were necessarily related to the negligence of this matter. The negligence and/or damages in connection with this lawsuit began on March 11, 2016.

We believe that the Department of Public Welfare may have paid a portion of the medical expenses related to the above time period.

Therefore, please allow this correspondence to serve as our formal notice to the Department of Public Welfare, as required by 1409(b)(5), of an action/claim filed against third parties for negligent medical care and treatment rendered.

Pursuant to 55 Pa. C. § 259.2(f) the required information is outlined as follows:

- 1). Name of Beneficiary: Laura Maietta
- 2.). MA Identification No.: 600760 2701430569 11 5

- 3). Client SS#: 205-60-7198
- 4). Client's Address: 30 Nutt Road
Apt. A1
Phoenixville, PA 19460
- 5). DOB: 12/01/1975
- 6). Beneficiary's Attorney: Clifford A. Rieders, Esquire
- 7). Name & Address of Tortfeasor: C.R. Bard, Inc.
c/o Richard B. North, Esquire
Nelson Mullins Riley &
Scarborough, LLP
201 17th Street, NW, Suite 1700
Atlantic Station
Atlanta, GA 30363
- 8). Insurance Companies & Claim Numbers: Unknown at this time
- 9). Insurance Adjustors & Phone Numbers: Unknown at this time
- 10). The date and specific injuries giving rise to the claim:
 - March 11, 2016. Injuries sustained from the fracture of the implanted Recovery Vena Cava Filter.
- 11). The Court & Docket No. in which the Claim is pending: United States District Court District of Arizona, Docket No.: 16-cv-04125
- 12). The filing date: A second amended Master Short Form Complaint was filed in this matter on November 30, 2016.
- 13). The close of discovery date: Unknown at this time.

Please advise our office of the amount of the lien that the Department of Public Welfare will be asserting with regard to this matter.

Thank you for your anticipated cooperation. Should you have any questions or need any additional information, please do not hesitate to contact our office.

Very truly yours,

RIEDERS, TRAVIS, HUMPHREY,
WATERS & DOHRMANN

Clifford Rieders

Clifford A. Rieders, Esquire

CAR/dsb